Comments of
Agricultural Energy Consumers Association
And Agricultural Council of California
on the DRAFT Aliso Canyon
Methane Leak Climate Impacts
Mitigation Program

Air Resources Board
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The Agricultural Energy Consumers Association (AECA) and Agricultural Council of California (Ag Council) appreciate the opportunity to comment on the Aliso Canyon Draft Mitigation Program (hereafter "draft plan").

AECA represents the energy interests of the state's leading agricultural groups, including Ag Council, and the leading dairy digester developers actively pursuing projects in California.

AECA and Ag Council support the draft plan and agree that dairy methane reduction projects should be a focus of any mitigation efforts. Dairy digesters represent a highly cost effective mitigation strategy that can easily achieve the required methane destruction needed to offset the leaked methane at Aliso Canyon. The draft plan and mitigation effort also provide a unique and timely opportunity to help catalyze the dairy digester industry in California and help achieve additional reductions in methane emissions over the near and long term.

Dairy methane digesters are among the most cost-effective investments the state can make to reduce methane emissions, according to a recent study by Ramboll Environ. The study identifies digesters as a particularly smart investment of Greenhouse Gas Reduction Fund dollars, particularly in light of their demonstrated ability to substantially reduce short-lived climate pollutants (methane) and their potential as a carbon-negative transportation fuel.

According to the study, dairy digesters provide substantial GHG reduction "bang for the buck" by returning one ton of CO2e for each two dollars invested by the state.

Mitigation through investment in dairy digesters and other dairy methane reduction projects on California dairies will provide significant benefits and achieve multiple state goals, including, but not limited to, the following:

- Significant **GHG-reduction** potential
- Significant **SLCP reduction** (methane)
- Significant potential to **reduce criteria pollutants (NOx and PM)** through the production and use of carbon negative transportation fuel for on-farm and heavy-duty freight transportation
- Significant **benefits to disadvantaged communities** including criteria-pollutant reductions, water quality improvements and nuisance and odor control
- Help in achieving the state's **50 percent reduction in petroleum use** goal by replacing diesel with renewable natural gas
- Furthering the state's **sustainable freight** strategy
- Substantial **clean energy** production
    - ✓ Renewable electricity
    - ✓ Renewable natural gas (RNG)
    - ✓ Renewable carbon-negative transportation fuel
- **Decarbonization** of the state's natural gas system

- **Job creation** and **economic development** in high unemployment rural communities
- Significant GHG offset and LCFS **credit production**
- Significant **water quality benefits** from advancements in manure management

In addition to the broad benefits outlined above, dairy methane reduction projects can easily meet and exceed each of the mitigation program objectives and criteria outlined in the draft plan. **Bottom line: Mitigation through the dairy sector can provide a cost-effective and efficient means to achieve the desired methane reductions while also providing tremendous momentum toward other state goals, including a very ambitious plan to reduce dairy methane emissions by 2030.**

AECA and Ag Council look forward to working with CARB, SoCal Gas Company and other stakeholders to quickly identify the best projects for the mitigation effort.